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 TACORI ENTERPRISES

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

TACORI ENTERPRISES,  Plaintiff,  vs.  BLUE NILE, INC.; KGK JEWELLERY MANUFACTURING LTD; GOLDSTAR JEWELLRY LLC; and DOES 1–10,  Defendants.	) Case No. 2:22-cv-03739-SVW-GJS ) ) <b>DECLARATION OF PAUL</b> ) <b>TACORIAN IN SUPPORT OF</b> ) <b>OPPOSITION TO</b> ) <b>DEFENDANT’S MOTION TO</b> ) <b>DISMISS PURSUANT TO FRCP</b> ) <b>12(B)(2)</b> ) <b>Judge:</b> Hon. Stephen V. Wilson ) <b>Date:</b> ) <b>Courtroom:</b> 10A ) <b>Time:</b>
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**DECLARATION OF PAUL K. TACORIAN**

I, Paul Tacorian, declare as follows:

1. I am the CEO of Plaintiff Tacori Enterprises (“Tacori”), a California corporation. I have personal knowledge of the matters stated in this declaration, and, if called as a witness, could and would testify competently thereto. I submit

1 this declaration in support of Tacori's Opposition to Defendant KGK Jewellery  
2 Manufacturing Ltd. ("KGK" or "Defendant") Notice of Motion and Motion to  
3 Dismiss Complaint for Lack of Personal Jurisdiction Pursuant to Fed. R. Civ. P.  
4 12(b)(2).

5 2. InDesign magazine named Tacori as the top two most visible jewelry  
6 brands in 2010, and in 2017, JCK magazine named Tacori as the top ten jewelry  
7 brands among affluent millennials. JCK featured Tacori on the front page of its  
8 JCK Show Daily magazine in 2018 and 2019, which was widely available to  
9 visitors and exhibitors of the JCK show (one of the largest and most prominent  
10 annual trade shows for the jewelry industry). Copies of these editorials are attached  
11 to this Declaration as Exhibit A.

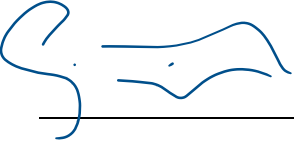
12 3. Upon information and belief, KGK was present for the annual JCK  
13 show for every year that Tacori has participated since at least as early as 1999.  
14 Further, according to Instore Magazine's annual survey of independent jewelry  
15 stores, Tacori ranks as the 18<sup>th</sup> most popular jewelry brand for 2022. A copy of  
16 Instore Magazine's survey is attached to this Declaration as Exhibit B.

17 4. KGK related entities have been a supplier of diamonds to Tacori for  
18 over 18 years, selling millions of diamonds to Tacori that it incorporates into its  
19 jewelry.

20 5. KGK related entities' bridal brand of goods can be found in United  
21 States retail stores that also carry Tacori.

22 6. Tacori sells jewelry through large retailer chains, such as Jared stores,  
23 which are owned and operated by Signet Jewelers. Signet Jewelers recently  
24 acquired Blue Nile, Inc.

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A handwritten signature in blue ink, appearing to read 'Paul K. Tacorian', is written over a horizontal line.

Paul K. Tacorian